



WHEREFORE Defendant AstraZeneca respectfully requests that this Court enter an Order excluding such documents and testimony and grant all other relief that this Court deems just and appropriate.

Dated: March 23, 2007

Respectfully submitted,

By: /s/ Katherine B. Schmeckpeper

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**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

I certify that counsel for AstraZeneca Pharmaceuticals LP conferred with counsel for Plaintiffs pursuant to L.R. 7.1 prior to filing this motion and Plaintiffs did not consent to the motion.

/s/ Katherine B. Schmeckpeper  
Katherine B. Schmeckpeper

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was delivered on March 23, 2007 to counsel for plaintiffs and to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, via LexisNexis File & Serve.

By: /s/ Katherine B. Schmeckpeper  
Katherine B. Schmeckpeper